

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES, *et al.*,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

No. 1:23-cv-00108-LMB-JFA

DAILY MAIL'S MOTION FOR PROTECTIVE ORDER

Pursuant to Federal Rule of Civil Procedure 26, non-party Daily Mail moves the Court to enter an order requiring defendant Google LLC to limit its deposition of Matthew Wheatland to 3.5 hours and non-duplicative questions regarding the proposed remedies in this case. The grounds and authorities in support of the motion are set forth in the accompanying memorandum of law. A proposed order granting this motion is submitted herewith.

Undersigned counsel certifies that a good faith effort to narrow or eliminate the dispute was undertaken prior to the filing of this motion.

Dated: June 6, 2025

Respectfully submitted,

/s/ Charles B. Molster

Charles B. Molster, III (Va. Bar No. 23613)
Law Offices of Charles B. Molster, III PLLC
2141 Wisconsin Avenue, Suite M
Washington, D.C. 20007
Office: (202) 787-1312
Cell: (703) 346-1505
Email: cmolster@molsterlaw.com

John Thorne*
Daniel G. Bird*
KELLOGG, HANSEN, TODD, FIGEL
& FREDERICK, P.L.L.C.
1615 M Street NW, Suite 400
Washington, DC 20036
Tel.: (202) 326-7900
Fax: (202) 326-7999
Email: jthorne@kellogghansen.com
dbird@kellogghansen.com

Counsel for Non-Party Daily Mail